REMARKS

No claims have been amended. Claims 1-31 are pending in this application.

Page 2 of the Office Action states "This communication is in response to the applicant's amendment filed March 27, 2006." Page 2 of the Office Action further states, "Applicant's arguments with respect to claims 1-31 have been considered but are moot in view of the new ground(s) of rejection." The Office Action, however, simply repeats the same rejection stated in the Office Action dated Dec. 28, 2005, to which the response dated March 27, 2006, was filed. Specifically, the Office Action repeats that claims 1-31 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Dian et al. (US 5,346,072) in view of Kara et al. (US 6,199,055). The present Office Action does not address in any manner the Applicant's previous response filed on March 27, 2006. Applicants again traverse this rejection, and respectfully request that the response as filed on March 27, 2006, reproduced below for the Examiner's convenience, be properly considered and a response provided.

The present invention is directed to a mail piece verification system for processing a mail piece that includes an incoming mail processing center for receiving a mail piece and obtaining data from the mail piece. The mail piece data is uploaded to a data center that performs a verification check on the mail piece data and downloads instructions, based upon the verification check, to an outgoing mail processing center located downstream from the incoming mail processing center. The outgoing mail processing center then uses the instructions, received from the data center, to process the mail piece.

In view of the above, claim 1 is directed to a mail piece verification system for processing mail pieces that comprises "an incoming mail processing center for receiving the mail piece and obtaining the mail piece data, the incoming mail processing center including a plurality of mail processing machines that perform automated processing of mail pieces; an outgoing mail processing center located downstream in the path of travel from the incoming mail processing center, the outgoing mail processing center including a plurality of mail processing machines that perform automated processing of mail pieces; and a data center in

operative communication with the incoming mail processing center and the outgoing mail processing center" wherein "the incoming mail processing center uploads the mail piece data to the data center; the data center performs a verification check on the mail piece data and downloads instructions based upon the verification check to the outgoing mail processing center; and the outgoing mail processing center uses the instructions to control operation of at least one of the mail processing machines located at the outgoing mail processing center to process the mail piece."

Dian et al., in contrast, is directed to a sorting installation for articles having different destinations that makes it possible to ensure that the level of use of conveyors associated with the pigeonholes for the less used destinations will be substantially increased. A sorting installation includes identical sorting machines interconnected in a closed loop by a common conveyor. Each sorting machine includes storage regions that correspond to major destinations and storage regions that correspond to destinations of reduced usage. If the destination of an article pertains to one of the destinations of reduced usage associated with a respective sorting machine, the article is transferred to one of the pigeonholes of the respective sorting machine. If the article being sorted belongs to one of the groups of destinations of reduced usage associated with one of the other sorting machines, the article is directed by a conveyor to an intermediate storage region, each of which is connected to the common conveyor. This allows the transfer, via the common conveyor, of articles located in the intermediate storage regions to the other sorting machines. (See Col. 3, line 36 to Col. 4, line 11).

Note first that Dian et al. is in no way directed to the verification of mail pieces, i.e., determining if an indicium on a mail piece that evidences payment of postage for the mail piece is valid. Dian et al. is instead directed to a sorting system for sorting articles having different destinations. There is no disclosure, teaching or suggestion in Dian et al. of a mail piece verification system for processing a mail piece in a path of travel that comprises an incoming mail processing center for receiving the mail piece and obtaining mail piece data, an outgoing mail processing center located downstream in a path of travel from the incoming mail processing center, and a data center in operative communication with the incoming mail processing center and the outgoing mail processing center, wherein the incoming mail

processing center uploads the mail piece data to the data center, the data center performs a verification check on the mail piece data and downloads instructions based upon the verification check to the outgoing mail processing center, and the outgoing mail processing center used the instructions to control operation of at least one mail processing machine located at the outgoing mail processing center to process the mail piece as in the present invention.

The Office Action contends that Dian et al., at Col. 1, line 32 to Col. 2, line 42, discloses these features. The passage cited in the Office Action is reproduced, in its entirety, below.

> One object of the present invention is to provide a sorting installation for articles having different destinations which makes it possible to ensure that the level of use of conveyors associated with the pigeonholes for the less used destinations will be substantially increased.
>
> Another object of the invention is to provide a sorting installation in which all the articles corresponding to the same little-used destination are all located in the same, unique pigeonhole at the end of the sorting operation.
>
> In order to achieve this aim, the installation for sorting articles having different destinations, said destinations being divided into N groups of little-used destinations, comprises n sorting machines, each machine M_i comprising p_i storage regions corresponding to p_i of the N groups of little-used destinations, in such a manner that:
>
> $$\sum_{i=1}^{i=n} p_i = N,$$
>
> common article transfer means connecting the n machines M_i in a closed circuit, each sorting machine comprising conveyor means for transferring the articles placed on its input having such destinations as pertain to the p_i groups associated with the machine to the p_i storage regions of the machine, n-1 intermediate storage regions, each intermediate storage region being associated with

the group of destinations associated with a respective one of the n-1 other machines, conveyor means for transferring the articles of the destination not pertaining to the p_i groups of destinations corresponding to the machine to the appropriate intermediate storage region, means for transferring the articles stored in each intermediate storage region to said common transfer means, temporary storage means for storing the articles places in said common transfer means whose destination pertains to one of the p_i groups associated with said machine, and means for conveying the articles stored in the temporary storage means to said conveyor means corresponding to said p_i storage regions of the machine in accordance with their destination.

In other words, the sorting installation according to the invention comprises n sorting machines which are interconnected by common conveyor means. The handling of the articles corresponding to little-used destinations is effected in the following manner. These destinations are distributed in groups, each machine being assigned to a certain number of these groups. When an article pertaining to a little-used destination is introduced to a sorting machine, either the article corresponds to a group of destinations associated with that machine to which the article is presented and it is sent directly to the corresponding storage region of this machine, or it pertains to a group of destinations assigned to another machine.

In the latter case, the article is passed to the machine associated with the group of destinations to which this article pertains, via the common conveyor means which interconnect all the sorting machines.

It will thus be understood that, for the overall installation, i.e. the set of n sorting machines, there is overall a single pigeonhole or storage region corresponding to each group of little-used destinations. Thus the conveyor associated with this pigeonhole is used to its maximum level, taking into account the articles to be sorted by the installation, since all the articles having this group of destinations will follow this conveyor. Furthermore all the articles corresponding to the same little-used destination end up in the same pigeonhole and there is no question of proceeding to a re-grouping operation, as in the known installations.

> According to a preferred embodiment, each of the n sorting machines further comprises main storage regions corresponding to major destinations and each machine comprises means for conveying articles corresponding to these main destinations to the associated main storage regions.

It is unclear to Applicants where each of the features as recited in the claims of the present invention can be found in the above passage from Dian et al., and respectfully request the Examiner to provide support for this contention. The system of Dian et al. is not related in any manner to the verification of mail pieces. Even if, for arguments sake, the sorting installation of Dian et al. was considered to be analogous to an incoming mail processing center, the system of Dian et al. still does not include any type of outgoing mail processing center located downstream in the path of travel from the incoming mail processing center or a data center in communication therewith. Furthermore, there is no disclosure, teaching or suggestion anywhere in Dian et al. of an incoming mail processing center uploading mail piece data to a data center, the data center performing a verification check on the mail piece data and downloading instructions based upon the verification check to the outgoing mail processing center. There is also no disclosure, teaching or suggestion in Dian et al. of the outgoing mail processing center using the instructions from the data center to control operation of a mail processing machine to process the mail piece.

As noted in the Office Action, Dian et al. does not disclose, teach or suggest a data center performing a verification check on mail piece data and downloading instructions based upon the verification to an outgoing mail processing center. To overcome this deficiency, the Office Action relies on the reference to Kara et al., and then concludes that it would have been obvious to combine the teachings of Dian et al. and Kara et al. in order to obtain greater security in the processing of mail. Applicants respectfully disagree.

Kara et al is directed to a method and system for conducting secure fault tolerant transactions remotely, such as, for example, purchasing a desired amount of postage credit from an authorized agent of the U.S. Post Office over an unsecured communication path, such as the Internet. A secure portable device is constructed with a memory and a processor to

control that memory. The device is arranged to communicate with a host processor based system, such as a PC, to exchange instructions therewith. The portable processor device operates through the use of atomic transactions to interact with the remote system to securely perform the desired transaction. Both the portable processor and the remote system store the state of the portable processor prior to performing the steps necessary to perform a particular transaction. Accordingly, if a communication error interrupts communication associated with a particular step, appropriate action may be taken at either or both the portable processor device or remote system to complete the transaction. Likewise, the storage of such state information facilitates the ability at either or both the portable processor device or remote processor device for providing roll back of the portable processor device in the case of an irrevocable error in the completion of the desired transaction. (Col. 4, lines 15-30).

Note first that Kara et al. is in no way directed to the verification of mail pieces, i.e., determining if an indicium on a mail piece that evidences payment of postage for the mail piece is valid. Kara et al. is instead directed to a method and system for conducting a fault tolerant transaction remotely, such as, for example, purchasing a desired amount of postage credit. Purchasing postage credit is not the same as verifying that an indicium on a mail piece is valid. There is no disclosure, teaching or suggestion in Kara et al. of a mail piece verification system for processing a mail piece in a path of travel that comprises an incoming mail processing center for receiving the mail piece and obtaining mail piece data, an outgoing mail processing center located downstream in a path of travel from the incoming mail processing center, and a data center in operative communication with the incoming mail processing center and the outgoing mail processing center, wherein the incoming mail processing center uploads the mail piece data to the data center, the data center performs a verification check on the mail piece data and downloads instructions based upon the verification check to the outgoing mail processing center, and the outgoing mail processing center used the instructions to control operation of at least one mail processing machine located at the outgoing mail processing center to process the mail piece as in the present invention.

The Office Action contends that Kara et al., at Col. 2, line 60 to Col. 3, line 35, discloses the features of a data center performing a verification check on the mail piece data

and downloading instructions based upon the verification check to the outgoing mail processing center. The passage cited in the Office Action is reproduced, in its entirety, below.

> These and other objects, features and technical advantages are achieved by a system and method wherein a secure portable device is constructed with a memory and having a processor controlling that memory. The device is arranged to communicate with a host processor based system, such as a PC, in order to exchange instructions therewith.
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> The portable processor device has on board certain security related fields, such as cryptographic keys, the current date and time, the balance, random number generators, number of transactions that have taken place on the device, and the serial number of the device. It also has on board, when the user initializes/authorizes the device, information about the owner of the device including his/her name, the registration number and other information about the owner such as the user's address and password.
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> Typically, the portable processor device will consist of a general purpose processor device which, as produced, includes certain necessary components for utilization as a secure portable processor according to the present invention. Upon initialization, a "raw" general purpose processor device will be adapted to operate according to the present invention. For example, program structure including a limited number of commands will be downloaded to firmware in the portable processor. Likewise, memory areas and cryptographic keys will be initialized in the device. Upon completion of initialization, the ability to change this initialization information will be "locked down," or irreversibly established, in order to unalterably define the general purpose processor device as a portable processor of the present invention.
>
> In order to utilize a particular portable processor device, a user will be required to receive authorization. The authorization process is to set up the secure device for use by a particular user and/or for particular purposes according to the present invention. Authorization may include the storage of certain information within the portable processor itself, such as the aforementioned information about the owner of the

> device including his/her name, the registration number and other information about the owner such as the user's address and password. Additionally, authorization may include recording certain information, such as identification of the portable processor device or the identification of a particular user associated with a portable processor device, at a centralized database for use in validating subsequent transactions.

It is unclear to Applicants where each of the features as recited in the claims of the present invention can be found in the above passage from Kara et al., and respectfully request the Examiner to provide support for this contention. The system of Kara et al. is not related in any manner to the verification of mail pieces, but is instead directed to a method for purchasing postage credit over an unsecured communication path.

There is simply no disclosure, teaching or suggestion in either Dian et al. or Kara et al., alone or in combination, of a mail piece verification system for processing a mail piece that comprises an outgoing mail processing center located downstream in the path of travel from the incoming mail processing center, the outgoing mail processing center including a plurality of mail processing machines that perform automated processing of mail pieces; and a data center in operative communication with the incoming mail processing center and the outgoing mail processing center wherein the incoming mail processing center uploads the mail piece data to the data center; the data center performs a verification check on the mail piece data and downloads instructions based upon the verification check to the outgoing mail processing center; and the outgoing mail processing center uses the instructions to control operation of at least one of the mail processing machines located at the outgoing mail processing center to process the mail piece as is recited in claim 1.

For at least the above reasons, Applicants respectfully submit that claim 1 is allowable over the prior art of record. Claims 2-14, dependent upon claim 1, are allowable along with claim 1 and on their own merits.

Claim 15 includes limitations substantially similar to those of claim 1. For the same reasons claim 1 is allowable over the prior art of record, Applicants respectfully submit that

claim 15 is allowable over the prior art of record. Claims 16-26, dependent upon claim 15, are allowable along with claim 15 and on their own merits.

Claim 27 includes limitations substantially similar to those of claim 1. For the same reasons claim 1 is allowable over the prior art of record, Applicants respectfully submit that claim 27 is allowable over the prior art of record. Claims 28-31, dependent upon claim 27, are allowable along with claim 27 and on their own merits.

In view of the foregoing remarks, it is respectfully submitted that the claims of this case are in a condition for allowance and favorable action thereon is requested.

Respectfully submitted,

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